

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ANTHONY JOYNER, Administrator  
Of The Estate of Amy Joyner Francis  
And INITA JOYNER, mother of  
Amy Joyner Francis,

Plaintiffs,

v.

THE NEW CASTLE COUNTY  
VOCATIONAL TECHNICAL  
SCHOOL DISTRICT, TRINITY  
CARR AND ZION SNOW,

Defendants.

C.A. No. 1:18-cv-00554 CFC  
CONSOLIDATED WITH  
(C.A. No. 1:18-cv-00945 CFC)

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JACOB A. FRANCIS, III, Father of  
Amy Joyner Francis,

Plaintiff,

v.

THE NEW CASTLE COUNTY  
VOCATIONAL TECHNICAL  
SCHOOL DISTRICT, TRINITY  
CARR AND ZION SNOW,

Defendants.

**PLAINTIFFS' MOTION FOR JUDGMENT BY DEFAULT  
AGAINST DEFENDANT ZION SNOW**

Plaintiffs move for judgment by default against defendant Zion Snow  
pursuant to FRCP 55(b)(2), and in support thereof state:

1. On September 10, 2018, plaintiffs filed an amendment to their Complaint pursuant to FRCP 4(e)(1), Delaware Super.Ct.Civ.R. 4(f)(V), and 10 DEL.C. § 3104, verifying service upon defendant Zion Snow had been duly made as of September 6, 2018 at the latest.

2. Defendant Snow has not entered an appearance, filed an answer, or requested an extension of time from plaintiffs or the Court to do so.

WHEREFORE, plaintiffs ask the Court to enter judgment by default in their favor and against defendant Zion Snow.

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